

## **REMARKS**

Claims 1-12 are the claims pending in the Application.

Claims 5, 7, 11, 12 have been amended to clarify features recited thereby.

### ***Formal Matters***

Applicant thanks the Examiner for acknowledging the claim for foreign priority and for acknowledging reception of certified copies of the priority document.

Applicant also thanks the Examiner for acknowledging review and consideration of the references cited in the Information Disclosure Statements filed on October 10, 2001 and December 1, 2001. However, Applicant respectfully requests the Examiner to acknowledge review and consideration of the references cited in the Information Disclosure Statement filed on June 17, 2005.

### ***Rejection of Claims 11 and 12 Under 35 U.S.C. § 101***

Claims 11 and 12 are rejected under 35 U.S.C. § 101 as directed to non-statutory subject matter. Claims 11 and 12 have been amended so that the program is embodied on a computer readable storage device. Applicant requests this rejection be withdrawn and the claims be allowed.

***Rejection of Claims 1,2,5,6 and 9-12 under 35 U.S.C. § 102(e)***

Claims 1, 2, 5, 6 and 9-12 are rejected under 35 U.S.C. 102(e) as being anticipated by Venkatesan et al, U.S. Patent 6,801,999. This rejection is traversed.

For at least the following reasons, Applicant's claimed invention is neither anticipated by nor obvious from the cited references. By way of example, independent claims 1, 5 and 9-12 require that the decrypting key be based on an IP address.

Venkatesan discloses an object containing BORE (break-once-run-everywhere) resistant watermarking such that N keys defining where N identical watermarks are placed in the object (Venkatesan, Abstract); an enforcer module in a digital rights management (DRM) system in the client computer with access to individual licenses that permit access to corresponding watermarked object files (Venkatesan, column 18, lines 62-67); such that the client PC uses its secret key to decrypt the encrypted watermark received.

Venkatesan does not disclose or suggest a decrypting key based on an IP address, as *inter alia* required by independent claims 1, 5 and 9-12. For example, according to an aspect of Applicant's claimed invention, a decrypting key provided to a receiving terminal for decrypting an encrypted content file is generated based on an IP address of the receiving terminal. Accordingly, the decrypting key can be tailored for the receiving terminal based on the receiving terminal's IP address. Venkatesan does not disclose or suggest such features, and clearly, Venkatesan does not disclose or suggest a decrypting key based on an IP address. Therefore, Venkatesan does not disclose or suggest the recitations of independent claims 1, 5 and 9-12.

Claims 2 and 6 depend from independent claims 1 and 5 respectively, and thus incorporate novel and nonobvious features thereof. Accordingly, claims 2 and 6 are patentably

distinguishable the prior art for at least the reasons that independent claims 1 and 5 are patentably distinguishable over the prior art.

***Rejection of Claims 3, 4, 7, and 8 under 35 U.S.C. § 103***

Claims 3, 4, 7 and 8 are rejected under 35 U.S.C. § 103 as being unpatentable over Venkatesan et al., U.S. Patent 6, 801, 999 in view of Wu et al., U.S. Patent 6,700,991. This rejection is traversed.

With respect to the rejection of claims 3, 4, 7 and 8, Wu does not remedy the deficiencies of Venkatesan as they relate to the above-discussed features. For example, Wu does not disclose or suggest a decrypting key based on an IP address and the Examiner does not allege that it does so.

For at least the foregoing reasons, Applicant believes that the Application is now allowable, and respectfully requests that the Examiner reconsider the rejections and allow the Application. Should the Examiner have any questions regarding this Amendment, or regarding the Application generally, the Examiner is invited to telephone the undersigned attorney.

Respectfully submitted,



George Brieger  
Registration No. 52, 652

Scully, Scott, Murphy & Presser  
400 Garden City Plaza, Suite 300  
Garden City, New York 11530  
(516) 742-4343 (telephone)  
(516) 742-4366 (facsimile)

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